



*Environmental Engineering, Civil Engineering
Forensic Engineering, Construction Services*

**ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT
APRIL 2019**

**Former United Shoe Machinery Division North Parcel
181 Elliott Street
Beverly, MA 01915**

Prepared for:

Cummings Properties, LLC
200 West Cummings Park
Woburn, MA 01801

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May 13, 2019

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1.0 INTRODUCTION

This Progress Report was prepared to detail the field and sampling activities associated with the former United Shoe Machinery (USM) Division North Parcel at 181 Elliott Street in Beverly, Massachusetts (also referred to as the “Site”). Actions completed in this report relate to the approved Written Proposal/Sampling and Analysis Plan Revision 2 (“SAP”) for the Site dated September 29, 2017. Refer to the attached **Figure 1** for the site locus and **Figure 2** for the site plan.

This Site has been identified in the RCRA 2020 Corrective Action Universe list established by the United States Environmental Protection Agency (EPA). By the year 2020, EPA and the authorized states plan to have largely completed the work of implementing final remedies at all facilities requiring Corrective Action. This Site is listed under site number MAD 043415991 as USM Machinery Division. As part of the RCRA 2020 program, EPA is overseeing an audit of the historical remedial actions conducted at the property by the former property owner, Stanley Black & Decker. EPA Region 1 has been working with the current owner’s representative, Cummings Properties, LLC, on this Site since 2009, and in EPA’s opinion, more sampling data are potentially needed to, among other things, understand whether vapor intrusion may be impacting indoor air quality and posing a threat to human health.

As part of EPA’s audit and review of existing sampling data, EPA requires further examination to determine:

- whether vapor intrusion is occurring at locations identified by EPA, including buildings 100, 500, and 600;
- whether contamination exists in the Shoe Ponds that presents ecological risk to aquatic life;
- whether all underground storage tanks have been removed or properly abandoned, if there are releases to the environment from the tanks, and the nature and extent of any migration of contamination from existing tanks;
- whether residual polychlorinated biphenyl (PCB) contamination exists on the fourth floor of Building 100 (formerly occupied by the North Shore Regional Vocational School) in or proximate to the former machine shop and any other area on-site where PCBs were used/managed/released and/or identified as a contaminant of concern; and

- whether the PCB disposal areas (former chip grind shed and former ballfield area) meet the requirement of 40 CFR § 761.61 and the January 9, 1997 approval letter from EPA, including but not limited to the following:
 - (1) required protective cover,
 - (2) required cover maintenance,
 - (3) required AUL documentation, and
 - (4) appropriate documentation to verify that stabilized PCB contaminated soils were placed at least one foot above the high water table so that no migration of PCBs to groundwater is occurring.

These requirements were set forth in an Administrative Consent Order (ACO) between EPA and Cummings Properties, LLC with an effective date of April 13, 2017.

Specifically, this report documents actions that have taken place in April 2019 in furtherance of the work required in the ACO. Work was done in accordance with the SAP, as updated September 29, 2017.

2.0 APRIL 2019 ACTIVITIES

No field sampling was performed in April 2019. There were no scheduled field activities based on the SAP or the Elliott Landing SAP. Also, with advance approval of EPA, no March 2019 Progress Report was submitted for the activities in March 2019 due, in part, to the filing with Massachusetts Department of Environmental Protection of IRA Status Report No. 2 (see below). A Supplemental Sampling and Analysis Plan for Vapor Intrusion was submitted on March 29, 2019. This plan was approved by EPA on April 24, 2019.

Actions taken in April 2019 included additional modifications to the HVAC system for Building 100 at Suites 135C and 140A in preparation for the additional sampling in the supplemental sampling and analysis plan.

Actions taken also included the submittal of a Massachusetts Contingency Plan (MCP) required report; a second Immediate Response Action (IRA) Status report was submitted to the Massachusetts Department of Environmental Protection on April 26, 2019. The IRA Status report summarized the vapor intrusion-related sampling efforts in Buildings 100 and 600 and discussed planned additional indoor air and soil gas sampling (the same sampling also discussed in the supplemental sampling and analysis plan).

EPA provided comments on the portion of the October 2018 Progress Report referring to the PCB data collected inside Building 100 on April 17-18, 2019. Responses to such comments and a plan for additional PCB sampling were submitted to EPA on May 7, 2019.

3.0 NEXT SCHEDULED ASSESSMENT ACTIVITIES

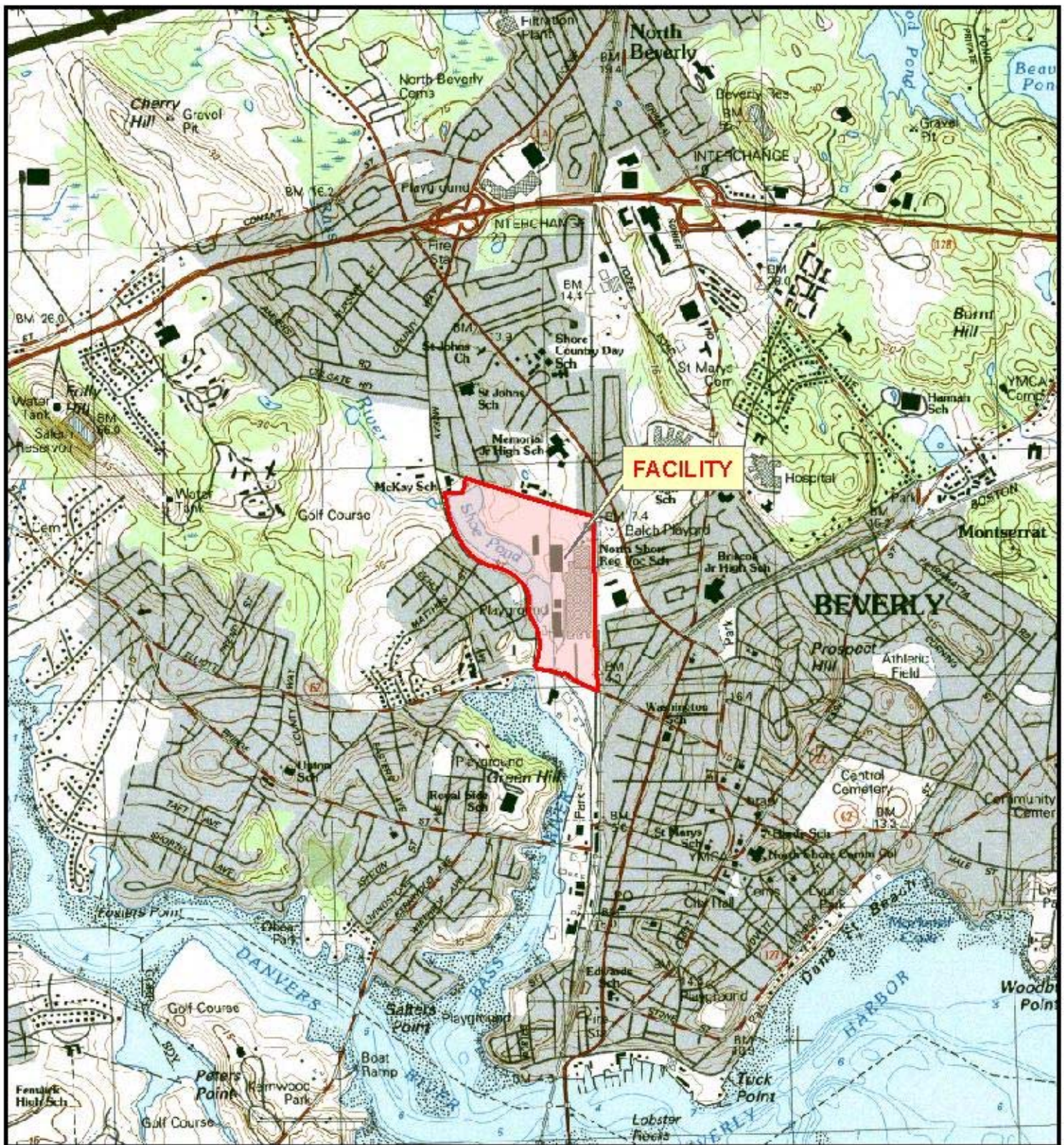
The indoor air and soil gas sampling related to the Supplemental Sampling and Analysis Plan for Vapor Intrusion were collected from May 2-4, 2019. As of the date of this report, the results have not been received. Details of this sampling will be included in the May 2019 Progress Report.

Cummings Properties is awaiting EPA's approval of the plan for additional PCB sampling inside Building 100. Depending upon when such approval is received, the additional PCB samples may be able to be collected in May 2019.

FIGURES

Figure 1 – Locus Plan

Figure 2 – Site Plan



SITE COORDINATES
 Longitude: -70.8871 W
 Latitude: 42.5596 N
 UTM 4,713,634m N
 345,086m E



Approximate Scale: 1 inch = 2,000 feet (1:24,000)

Figure 1 - Locus Plan

Project Number: 12201
 Client: Cummings

Created By: EAF Date: 03/15/12
 Checked By: BH Date: 03/15/12

Former United Shoe Machinery North Parcel
 181 Elliott Street
 Beverly, MA

Reference: MassGIS USGS Quadrangle: SALEM and MARBLEHEAD NORTH
 Image: M\12201_Beverly\2012\Figures



FIGURE 2

SITE PLAN

FORMER UNITED SHOE
MACHINERY NORTH PARCEL
181 ELLIOTT STREET
BEVERLY MA

LEGEND

-  STABILIZED SOIL DISPOSAL AREA
-  TANKS
-  FSL-X PROPOSED WELL
-  HISTORIC PHASE II WELL

NORTH 



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NOTE:
Locations taken from Haley & Aldrich Plan
Dated October 30, 1997.

SCALE:	1'=125' +/-
DRAWN:	RT
CHK'D:	BAH
DATE:	3/29/17
DATE REV:	3/12/18